

**2. Rejection of claims 1, 3-8, 10, 12-15 under 102(b) as being anticipated by Wnendt et al.**

The Examiner rejects claims 1, 3-8, 10, 12-15 under 35 U.S.C. 102(b) as being anticipated by Wnendt et al. (U.S. patent 5,408,228).

The Applicant respectfully disagrees with the Examiner that claims 1, 3-8, 10, 12-15 are anticipated by Wnendt.

The Examiner alleges that the Wnendt patent discloses the invention substantially as claimed in claims 1, 3, 4, 6, 10 and 12-15. In particular, the Examiner identifies the Milbus repeater of Wnendt with the address remapper of the claimed invention. The Applicant points out that the Milbus repeater of Wnendt cannot be identified with the address remapper of the claimed invention as they are different elements which perform different functions.

Claim 1 recites an "address remapper .... remapping a dummy address from the other section into a physical address to the one section". However, the Milbus repeater of Wnendt does not remap addresses. Wnendt is concerned with how to connect and disconnect a main serial bus to or from other buses in a circuit. In Wnendt, the repeater is essentially a switch which selectively connects a primary bus 1 with a secondary bus 2 or an internal bus 3. Frames sent by the primary side are transmitted by bus 2 or bus 3 depending on a subaddress field. Thus, instead of remapping addresses, data received by the device are distributed between the secondary bus and the internal bus according to the coded address and subaddress of each data transmission (see abstract, lines 4 to 8). The static subaddress field is used to govern the active switching function of the repeater. As described in column 2, lines 43 to 50 of Wnendt, when the Milbus receives a transmission intended for the secondary bus (for which the address is the same as the internal Milbus but having a different subaddress), the Milbus repeater's own internal RT (Remote Terminal) is disconnected. This allows the transmission to be switched to

the secondary bus without remapping data within the frame. The distinction between the claimed invention and the technique disclosed in Wnendt is also readily apparent in the only Figure of Wnendt. The Figure shows three buses which are connected or disconnected depending on the specific subaddress in the transmission frame, and no address remapping occurs.

In contrast, the remapper of the present invention acts transparently and at no time is the bus connection broken. It just remaps "a dummy address from the other section into a physical address to the one section", as recited in claim 1. Frames which are sent are seen by either side (main bus and remapped devices) and apart from isolating the remapper from the bus during the remapping step, no part of the bus is itself disconnected during frame transmission.

The present invention is not concerned with what address is sent on the bus. It remaps all of them and is completely transparent.

Further, the Examiner identifies the "subaddress" of Wnendt with the "dummy address" recited in the claims. The Applicant points out that the "subaddress" and the "dummy address" are not the same. In fact, "subaddress" and "dummy address" are distinct terms of art in the computer field. A subaddress is used in contexts where a hierarchical addressing scheme is contemplated, as is the case in Wnendt. In contrast, a dummy address refers to the substitutional nature of the mapping scheme of the present invention.

Therefore, the Wnendt patent which does not disclose an address remapper nor the use of a dummy address as recited in claim 1, does not anticipate the invention as claimed in claim 1.

Additionally, for the same reasons as for claim 1, independent claims 4, 10 and 13 are not anticipated by the Wnendt patent. In particular, claim 4 recites an address remapper for a bus comprising address remapping means, and claim 10 recites the step of remapping the address

before transmitting it to the other section of the bus, which address remapping means and remapping step are not disclosed in Wnendt. As to claim 13, it recites an address remapper remapping a dummy address, which is not disclosed in Wnendt as shown above.

The Applicant thus submits that independent claims 1, 4, 10 and 13 are not anticipated by the Wnendt patent, and withdrawal of the rejection under 102(b) is hereby requested. It is further submitted that claims 2, 3, 5-8, 11, 12, 14 and 15 which depend on claims 1, 4, 10 and 13 respectively, are not anticipated by the Wnendt patent either.

Additionally, a person skilled in the art would have no reason to modify the Wnendt patent to arrive at the claimed invention. The Wnendt apparatus is self-sufficient and the necessary modification of the Wnendt invention to arrive at the claimed invention would be too substantial to be obvious to one skilled in the art. Further, there is no suggestion or motivation in Wnendt for such modification.

It is therefore submitted that independent claims 1, 4, 10 and 13 are unobvious in view of Wnendt and are thus patentable over Wnendt. It is further submitted that claims 2, 3, 5-8, 11, 12, 14 and 15 which depend on claims 1, 4, 10 and 13 respectively, are also patentable over Wnendt.

It is further submitted that amended claim 8 is patentably distinct from the Wnendt patent on its own merits. Indeed, amended claim 8 recites "switching means for selectively disconnecting the bus during the remapping operation", whereas the Wnendt patent teaches the use of a switch for switching the transmission from one bus to the other.

**3. Rejection of claims 4 and 10 under 102(b) as being anticipated by Fitzgerald et al.**

The Examiner rejects claims 4 and 10 under 35 U.S.C. 102(b) as being anticipated by Fitzgerald et al. (U.S. patent No. 3,940,743). The Applicant respectfully disagrees with the Examiner that claims 4 and 10 are anticipated by Fitzgerald.

The Applicant notes that the Examiner's rejection of claims 4 and 10 is very succinct and does not specifically set forth where each element of the claims is disclosed in the cited reference. Under 37 C.F.R. 1.104 (c) (2) which relates to Rejection of claims, "when a reference is complex ... the particular part relied on must be designated as nearly as practicable" and "the pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified". If the Examiner is not persuaded by the arguments presented below in support of the patentability of claims 4 and 10 over the Fitzgerald patent, the Examiner is respectfully requested to particularly point out for every rejected claim, where each claimed element may be found in the Fitzgerald patent.

This notwithstanding, upon review of the Fitzgerald patent, the Applicant submits that claims 4 and 10 are not anticipated by Fitzgerald. Indeed, claim 4 recites "address remapping means for remapping the address and transmitting the remapped address to the other section of the bus", and claim 10 recites the step of "remapping the address before transmitting it to the other section of the bus". In contrast, the Fitzgerald invention does not remap addresses, but instead selectively decodes the data frame's address fields and transmits them to the second bus if the address matches a predetermined range. See abstract and column 5, lines 20 to 26 of Fitzgerald. The address decoding of Fitzgerald governs various switching actions and in no instances does a remapping of addresses occur, in sharp contrast with the address remapping recited in claims 4 and 10.

The Applicant thus submits that independent claims 4 and 10 are not anticipated by the Fitzgerald patent, and withdrawal of the rejection under 102(b) is hereby requested.

Additionally, a person skilled in the art would have no reason to modify the Fitzgerald patent to arrive at the claimed invention as there are no suggestion or motivation in Fitzgerald for such modification. It is therefore submitted that independent claims 4 and 10 are unobvious in view of Fitzgerald and are thus patentable over Fitzgerald.

**4. Rejection of claims 2 and 11 under 103(a) as being unpatentable over Wnendt et al.**

As described above, a dummy address is not the same as a subaddress, and such a distinction would be clear to one skilled in the art. In addition, the Wnendt patent does not, at any point, describe or allude to changing the address in the data frame, whether in the form of a one-bit change as claimed in claim 2 or otherwise. Thus modifying the Wnendt patent to arrive at the invention of claim 2 would require much more than a simple design choice as asserted by the Examiner. The Wnendt patent is not concerned with changing or remapping addresses, but rather, is concerned with controlling the distribution of data by interpreting fixed address and subaddress fields in decoded data frames (see column 2, lines 2 and 3, and column 3, lines 13 to 19).

Further, the Wnendt patent at no point describes or suggests any method for obtaining a dummy address. Further, nothing in Wnendt would motivate a skilled person to modify the Wnendt invention to implement a method of obtaining a dummy address as claimed in claim 2. Additionally, attempting such modification of Wnendt would result in arbitrary coding variations in bus transmission protocols which are usually fatal to the proper operation of a bus architecture. This would therefore predicate against one skilled in the art considering such a modification. Claim 2 is thus unobvious in view of Wnendt.

As to claim 11 rejected as being obvious in view of Wnendt, the Examiner does not provide any rationale for his rejection. It appears to the Applicant that the Examiner may have intended to reject claim 12 instead. If such is the case, the Applicant submits that claim 12 is unobvious in view of Wnendt for the same reasons as given above for claim 2. If the Examiner intended to reject claim 11, the Applicant respectfully requests that the Examiner provide his rationale as to why he believes claim 11 is rendered obvious and specifically point out where in Wnendt the suggestion for claim 11 may be found.

#### **5. Conclusion**

In view of the foregoing, it is submitted that claims 1-15 are patentable over the cited prior art. Having thus overcome the objection made in the Office Action, withdrawal of the rejections and expedited passage of the application to issue is requested. If there are any remaining issues to be resolved, the Applicant requests that the Examiner contact the undersigned attorney for a telephone interview.

The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account No. 12-0415 and, in particular, if this response is not timely filed, then the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 C.F.R. 1.136 (a) by the number of months necessary to

make this response timely filed, and the petition fee due in connection therewith may be charged to the deposit account.

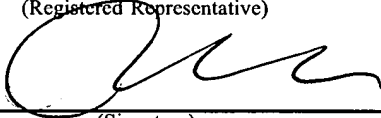
I hereby certify that this correspondence is being deposited with the United States Post Office with sufficient postage as first class mail in an envelope addressed to: Commissioner of Patents and Trademarks, Washington, D.C., 20231 on

February 14, 2001

(Date of Deposit)

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Respectfully submitted,



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